

Central Valley Regional Water Quality Control Board

17 April 2012

Mr. Parry Klassen
Mr. Wayne Zipser
East San Joaquin Water Quality Coalition
1201 L Street
Modesto, CA 95954

EAST SAN JOAQUIN WATER QUALITY COALITION MONITORING MODIFICATIONS

Thank you for submitting your 16 April 2012 request to amend the East San Joaquin Water Quality Coalition (Coalition) Monitoring and Reporting Program (MRP) Plan. The Coalition proposes to suspend monitoring at core sites, reduce monitoring at assessment sites, and eliminate Management Plan Monitoring (with one exception) for the remainder of 2012. The Coalition has indicated outreach, management practice implementation and evaluation would remain unchanged.

The new waste discharge requirements (WDRs) and MRP Order for the eastern San Joaquin River watershed are scheduled to be adopted by the end of the year. The Coalition has incurred additional expenses in working cooperatively with Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff to develop those WDRs, which include important new groundwater quality provisions. Central Valley Water Board staff has determined that a limited, temporary suspension of surface water monitoring will not unduly impact the board's ability to evaluate the Coalition's ongoing efforts to address surface water quality problems. Many of the changes requested represent an appropriate transition from the current monitoring requirements under the MRP Order R5-2008-0005, to the monitoring strategy that is envisioned for the new MRP Order.

Therefore, I approve the Coalition's request to amend the provisions of MRP Order R5-2008-005 applicable to Coalition's MRP Plan by suspending monitoring, as follows:

- 1. Monitoring at core sites.** Monitoring is suspended.
- 2. Reduce constituents to be monitored at assessment sites.** Organochlorines (including Group A organochlorines), paraquat, glyphosate, all metals except copper and zinc, Total Kjeldahl Nitrogen, total phosphorus, and *E. coli* do not need to be monitored.
- 3. Management Plan Monitoring (MPM) with the exception of Bear Creek at Kibby Road.** All MPM scheduled for 2012 is suspended, with the exception of Bear Creek at Kibby Road. The monitoring at the Bear Creek at Kibby Road site is part of a cost-share for Proposition 84 funded projects in the area.

The above monitoring is suspended until directed otherwise by the Executive Officer or superseded by a new MRP Order issued by the Central Valley Water Board or the Executive Officer.

To document these changes in the MRP Plan, please submit the following by **30 April 2012**:

- Updated amendment table, Table A, which summarizes all changes to the Coalition's MRP Plan; revisions to Tables 8, 9, 10, 12, and 13 of the MRP Plan
- Updated management plan amendment summary table, Table A in the Coalition's Management Plan; revisions to Table 7 of the Management Plan.

I understand the concerns of the Coalition in raising fees on member growers, since there are a significant number of non-members in your area. The adoption of WDRs that address discharges to both groundwater and surface water will simplify future outreach and enforcement efforts. With the adoption of the new WDRs and increased membership, I will expect the Coalition to ensure it has the financial capacity to carry out the provisions of any adopted WDR and MRP.

I greatly appreciate the efforts of the Coalition to date, which has resulted in the collection of over 50,000 data points and significant strides in addressing surface water quality problems. I look forward to continuing to work collaboratively in addressing critical groundwater and surface water quality problems in a cost effective manner.

If you have questions regarding this letter, please contact Joe Karkoski at (916) 464-4668 or Susan Fregien at (916) 464-4813, or by e-mail at sfregien@waterboards.ca.gov.

Original signed by

Pamela C. Creedon
Executive Officer